

**Granted.**

8:58 AM, Feb 1, 2021

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**



JANE DOE,	:	CASE NO.: 2:20-cv-00459
	:	
Plaintiff,	:	JUDGE GRAHAM
	:	
vs.	:	MAGISTRATE JUDGE LITKOVITZ
	:	
ANDREW K. MITCHELL, <i>et al.</i> ,	:	
	:	
Defendants.	:	

**JOINT MOTION TO AMEND THE CALENDAR ORDER TO EXTEND THE  
PRIMARY EXPERT REPORT DEADLINE**

Now come the Parties, by and through their respective counsel, and request this Court to amend the Calendar Order extending the February 12, 2021 Primary Expert Deadline by thirty-one ("31") days to March 15, 2021. The grounds in support of this Motion are set forth in the Memorandum in Support, attached hereto and incorporated herein.

Respectfully submitted,

/s/ David A. Goldstein  
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### **MEMORANDUM IN SUPPORT**

The Parties respectfully request this Honorable Court to extend the February 12, 2021 deadline to produce the primary expert reports by thirty-one (“31”) days to March 15, 2021. The Parties have faced delays, including discovery and communication delays relating to the COVID-19 pandemic, such that the Parties need additional time in which to complete the primary expert reports.

The purpose of this Motion is not to delay the above-captioned case, but rather allow the Parties additional time to appropriately completely the required primary expert reports.

For all of the foregoing reasons, the Parties respectfully request that this Honorable Court amend the Calendar Order extending the February 12, 2021 Primary Expert Deadline by thirty-one (“31”) days to March 15, 2021.

Respectfully submitted,

/s/ David A. Goldstein

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document has been sent via Electronic Mail this 29th day of January 2021 to **Scott C. Walker, Esq.**, Attorney for Defendant Andrew K. Mitchell, at Walker Novack Legal Group, LLC, 5013 Pine Creek Drive, Westerville, Ohio 43081, tom@walkernovack.com, **Thomas J. Novack, Esq.**, Attorney for Defendant Andrew K. Mitchell, at Walker Novack Legal Group, LLC, 5013 Pine Creek Drive, Westerville, Ohio 43081, scott@walkernovack.com, **Janet R. Hill Arbogast, Esq.**, Attorney for Defendant City of Columbus, at City of Columbus, Department of Law, 77 North Front Street, 4th Floor, Columbus, Ohio 43215, jrhillarbogast@columbus.gov, and, **Joseph M. Gibson, Esq.**, Attorney for Defendant City of Columbus, at City of Columbus, Department of Law, 77 North Front Street, 4th Floor, Columbus, Ohio 43215, jmgibson@columbus.gov.

/s/ David A. Goldstein  
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